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September 21, 2000

Mr. Larry Gore Bureau of Land Management Dixie Resource Area 345 Riverside Drive St. George, Utah 84770

Re: Goldstrike Application Area Issue, M/053/005, Washington County, Utah

Dear Larry:

I apologize for the delay in replying to your E-mail on August 23. I have made some inquires and this is what I have came up with so far.

DWQ still feel that we need to apply the solutions on the surface. They feel that the elevated levels of nitrates will stand a better chance of being volatilized if the solutions are sprayed into the air. They said that if the maintenance of the spray heads are that much of a problem, we could allow the water to run over the surface, as long as there is some exposure before it sinks. This would not do much for our problem as we still have a water source for the cows.

As to long term plans for the application, I'm hoping that this next sample analysis will provide enough comfort level that DWQ might allow us to remove any surface indication of water. If not, we will continue to apply water. Sampling of the pad effluent will probably continue for several years, I think you said BLM may require up to a five year monitoring period. We have made contingencies to allow us to sample the solution without having to have the surface application system. I'm sure we'd like to reduce the monitoring period but everybody has to buy off on this area before we can let it rest.

I never thought of it but your suggestion of using something like the utilization cages to cover the spray heads is a excellent idea. Is it possible for BLM to furnish four or five of these units for us to use for this purpose? If we had them we could eliminate the fence and the pressure of the cows to get to the water.

There is nothing available to us to indicate whether this water has any long term effect of the cattle drinking this water. I know that cows and wildlife have been drinking it for quite a few years and if there was going to be any problem I'm sure we would have seen something by now.

There is still about \$100,000 left in the bond, so continued monitoring will not be a financial problem. I think we are just looking at the site as an additional area to monitor.

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As for our release criteria for the site. I was out there this spring and felt that, overall, the site could be considered for release next year. This will be the start of the third year for the reclamation. It's going to be hard for anyone to assess the impacts of the cows remaining on site to the revegetation effort. One of the big problems is that the areas we are looking to release (plant site, heaps and upper areas) has the application area in the middle of it. That brings all the cattle pressure into the area that we are trying to attain a plant density in. All the areas below the plant site, with the exception of the reclaimed roads, have been released. That was part of the reason I suggested putting a fence below the plant site to allow the cattle owner to have access to that area under BLM supervision. But with another dry year like this one, the cows will fight the fence to get to the water, the same way they do now.

I guess my opinion is the sooner we release the site the sooner the BLM can begin the supervised use of the area. There will also be a benefit from the increased AUM's that this reclamation effort will bring to the site. Also, this would place the responsibility on the cattle owner to regulate the numbers on the site at any one time.

I will give you a call if I get into the St. George area and we can talk about this. Thanks for your assistance with everything.

Sincerely,

Doug Jensen

Senior Reclamation Specialist

jb M053-05-app-ltr